

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED**March 28, 2025**

Nathan Ochsner, Clerk of Court

United States of America
v.
Carlo Ivan HURTADO (Y.O.B. 1998)
Citizenship: U.S.A

Case No. 7:25-mj-00624-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.


On or about the date(s) of March 28, 2025 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:*Code Section*Title 18, United States Code,
Section 2251(a) Sexual Exploitation
of a Child - Production of Child
Pornography*Offense Description*Any person who employs, uses, induces, entices, or coerces, a minor to
engage in any sexually explicit conduct with the purpose of producing a
visual depiction of such conduct, and the visual depiction was produced using
materials that have been mailed, shipped or transported in or affecting
interstate or foreign commerce.

This criminal complaint is based on these facts:

See "Attachment A"

☒ Continued on the attached sheet./s/ Robert Turnholt*Complainant's signature*Robert Turnholt - HSI Special Agent*Printed name and title*

Complaint authorized by: AUSA Alexis Garcia

Submitted by reliable electronic means, sworn to and attested
telephonically per Fed. R. Cr.P.4.1, and probable cause
found on:Date: 03/28/2025 at 9:14 p.m.City and state: McAllen, Texas
*Judge's signature*J. Scott Hacker, U.S. Magistrate Judge*Printed name and title*

"ATTACHMENT A"

I am a Special Agent (SA) of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

On March 28, 2025, Special Agent (SA) Robert Turnholt from Homeland Security Investigations (HSI) McAllen, Texas was notified that Carlo Ivan HURTADO arrived at the Hidalgo, Texas Port of Entry (POE) with a 16-year-old female (hereinafter referred to as MV1). During questioning about their travel and relationship, HURTADO admitted he knew MV1 was 16 years old.

MV1 told Department of Public Safety investigators she stayed in a hotel room with HURTADO in McAllen, Texas on the night of March 27, 2025. While in the hotel, MV1 and HURTADO had sexual intercourse. They recorded the intercourse using MV1's Snapchat account and sent time images and videos to each others' cell phones. MV1 consented to a search of her cell phone.

During the investigation, investigators observed images and videos that depicted HURTADO touching MV1's vagina and penetrating MV1's vagina with his fingers, as well as images and videos of HURTADO and MV1 laying nude in bed together with MV1's breasts exposed.